



NEW YORK  
REGIONAL OFFICE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
100 PEARL STREET, SUITE 20-100  
NEW YORK, NY 10004-2616

August 28, 2024

**VIA ECF**

The Honorable Judge Jesse M. Furman  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: SEC v. Mmobuosi, et al., No. 23 Civ. 10928 (JMF)**

Dear Judge Furman:

Plaintiff Securities and Exchange Commission ("SEC") respectfully submits this letter to notify the Court of correspondence received today, August 28, 2024, from John M. Scott, Chairman of the Board of Directors and the new Interim Chief Executive Officer for corporate defendant Tingo Group, Inc. ("Tingo Group"). Mr. Scott requested that the SEC bring the enclosed letter to the Court's attention for consideration in connection with the SEC's pending motion for default judgment (the "Motion"). (Dkt. 67). The letter confirms that Tingo Group is in default and will not be appearing through counsel in this action, and the SEC stands by the arguments made in support of the Motion and the relief requested therein. As none of the defendants have entered an appearance or filed an opposition to the Motion by their August 16 deadline, the SEC respectfully requests that the Court enter the SEC's Proposed Default Judgment (Dkt. 71) against all defendants as unopposed.

Respectfully submitted,

/s/ Michael S. DiBattista

Michael S. DiBattista  
Counsel to SEC

Encl.